U.S. Department of the Interior
PRIVACY IMPACT ASSESSMENT

Introduction

The Department of the Interior requires PIAs to be conducted and maintained on all IT systems whether already in existence, in development or undergoing modification in order to adequately evaluate privacy risks, ensure the protection of privacy information, and consider privacy implications throughout the information system development life cycle. This PIA form may not be modified and must be completed electronically; hand-written submissions will not be accepted. See the DOI PIA Guide for additional guidance on conducting a PIA or meeting the requirements of the E-Government Act of 2002. See Section 6.0 of the DOI PIA Guide for specific guidance on answering the questions in this form.

NOTE: See Section 7.0 of the DOI PIA Guide for guidance on using the DOI Adapted PIA template to assess third-party websites or applications.

Name of Project: Interior Department Electronic Acquisition System (IDEAS) Decommissioning
Bureau/Office: Interior Business Center, Financial Management Directorate
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Section 1. General System Information

A. Is a full PIA required?

☒ Yes, information is collected from or maintained on
    ☐ Members of the general public
    ☒ Federal personnel and/or Federal contractors
    ☐ Volunteers
    ☐ All

☐ No: *Information is NOT collected, maintained, or used that is identifiable to the individual in this system. Only sections 1 and 5 of this form are required to be completed.*

B. What is the purpose of the system?

The Interior Department Electronic Acquisition System (IDEAS) was a client-server based commercial-off-the-shelf software used as a procurement application that provided electronic commerce tools to manage, report, and process the acquisition of products and

services for the Department of Interior (DOI), Federal agency customers, and external customer. IDEAS enabled DOI and external customer organization procurement offices to electronically transmit Requests for Proposals (RFPs) or Requests for Quotations (RFQs) and allowed vendors to submit quotes electronically in response. IDEAS is being decommissioned because the vendor, CGI, no longer supports this software. Below is the description of the decommissioning of the software, hardware, and data.

Software: After the system was decommissioned, the IDEAS software was stored on a compact disk (CD). The CD also contains instructions for installing the IDEAS software on IBM PC compatible computers and instructions for upgrading Oracle and Sybase databases to the latest version. This archived information is included in the Records Transfer Number, PT-048-2015-0096, and contains only unclassified information for the IDEAS information system.

Hardware: All IDEAS related hardware is on the DOI Virtual Environment. IDEAS is a Windows and Linux based system, which consists of six servers, and interfaces with external systems. IDEAS has a public-facing component that displays information accessible to vendors. The other components of IDEAS are internal to DOI and restricted to DOI users. IDEAS also interconnects with agencies outside of the DOI. The Agency IDEAS Procurement Desktop (PD) installation resides in their respective agency's information system. After the IDEAS hardware was decommissioned, the database and application servers, would be re-purposed for other ongoing and new applications.

Data:

- The following bureaus and offices migrated data from IDEAS to the DOI Financial Business Management System (FBMS) in accordance with the planned deployment schedule for each bureau/office and began using FBMS:
    - Bureau of Indian Affairs
    - Bureau of Land Management
    - Bureau of Ocean Energy Management
    - Bureau of Safety and Environmental Enforcement
    - Bureau of Reclamation
    - U.S. Fish and Wildlife Service
    - National Park Service
    - Office of Surface Mining Reclamation and Enforcement
    - Interior Business Center
    - U.S. Geological Survey
    - Office of the Secretary and Departmental Offices, including Office of the Special Trustee

- National Transportation Safety Board (NTSB), a Federal agency customer using IDEAS, migrated its data to the DOI Momentum application.

- The following Federal agency customers and external customer maintained their IDEAS

production application, data files, and archive in accordance with their agency records retention policy and schedule.
   ○ Federal Communications Commission
   ○ U.S. Maritime Administration
   ○ Department of Justice, Office of Justice Programs
   ○ John F. Kennedy Center for the Performing Arts

C. What is the legal authority?

The E-Government Act of 2002 (P.L.107-347) and Expanding Electronic Government in the President's Management Agenda.

D. Why is this PIA being completed or modified?

☐New Information System
☐New Electronic Collection
☐Existing Information System under Periodic Review
☐Merging of Systems
☐Significantly Modified Information System
☐Conversion from Paper to Electronic Records
☒Retiring or Decommissioning a System
☐Other: *Describe*

E. Is this information system registered in CSAM?

☒Yes: *Enter the UII Code and the System Security Plan (SSP) Name:*

010-000000365; Interior Department Electronic Acquisition System (IDEAS) System Security Plan

☐No

F. List all minor applications or subsystems that are hosted on this system and covered under this privacy impact assessment.

Subsystem Name	Purpose	Contains PII *(Yes/No)*	Describe *If Yes, provide a description.*
None	None	No	N/A

G. Does this information system or electronic collection require a published Privacy Act System of Records Notice (SORN)?

☒Yes: *List Privacy Act SORN Identifier(s)*

IDEAS records are covered by DOI-89, Financial and Business Management System (FBMS) – Grants and Cooperative Agreements, July 28, 2008 (73 FR 43775). DOI-89 is currently being revised to reflect updates and changes to the system.

☐No

H. Does this information system or electronic collection require an OMB Control Number?

☐Yes: *Describe*
☒No

Section 2. Summary of System Data

A. What PII will be collected? Indicate all that apply.

☐Name
☐Citizenship
☐Gender
☐Birth Date
☐Group Affiliation
☐Marital Status
☐Biometrics
☐Other Names Used
☐Truncated SSN
☐Legal Status
☐Place of Birth
☐Religious Preference
☐Security Clearance
☐Spouse Information
☐Financial Information
☐Medical Information
☐Disability Information
☐Credit Card Number
☐Law Enforcement
☐Education Information
☐Emergency Contact
☐Driver's License
☐Race/Ethnicity
☐Social Security Number (SSN)
☐Personal Cell Telephone Number
☐Tribal or Other ID Number
☐Personal Email Address

☐ Mother's Maiden Name
☐ Home Telephone Number
☐ Child or Dependent Information
☐ Employment Information
☐ Military Status/Service
☐ Mailing/Home Address
☒ Other: *Specify the PII collected.*

This system is no longer used to collect or maintain personally identifiable information (PII). IDEAS has been decommissioned and the data was successfully migrated or archived.

B. What is the source for the PII collected? Indicate all that apply.

☐ Individual
☐ Federal agency
☐ Tribal agency
☐ Local agency
☐ DOI records
☐ Third party source
☐ State agency
☒ Other: *Describe*

This system is no longer used to collect or maintain PII. IDEAS has been decommissioned and the data successfully was migrated or archived.

C. How will the information be collected? Indicate all that apply.

☐ Paper Format
☐ Email
☐ Face-to-Face Contact
☐ Web site
☐ Fax
☐ Telephone Interview
☐ Information Shared Between Systems
☒ Other: *Describe*

This system is no longer used to collect or maintain PII. IDEAS has been decommissioned and the data successfully was migrated or archived.

D. What is the intended use of the PII collected?
Not applicable as this system is decommissioned and is no longer used to collect or maintain PII. For more information on bureau/office or NTSB data that was migrated, please see the FBMS Cloud and Momentum PIAs. Federal agency customers and external customer that maintained

their IDEAS production application, data files, and archive are responsible for the collection and maintenance of their agency records.

E. With whom will the PII be shared, both within DOI and outside DOI? Indicate all that apply.

☒Within the Bureau/Office: *Describe the bureau/office and how the data will be used.*

Not applicable as this system is decommissioned and is no longer used to collect or maintain PII. For more information on IBC data that was migrated, please see the FBMS Cloud PIA.

☒Other Bureaus/Offices: *Describe the bureau/office and how the data will be used.*

Not applicable as this system is decommissioned and is no longer used to collect or maintain PII. For more information on bureau/office data that was migrated, please see the FBMS Cloud PIA.

☒Other Federal Agencies: *Describe the federal agency and how the data will be used.*

Not applicable as this system is decommissioned and is no longer used to collect or maintain PII. For more information on the NTSB data that was migrated, please see the Momentum PIA. Federal agency customers and external customer that maintained their IDEAS production application, data files, and archive are responsible for the sharing of their agency records.

☐Tribal, State or Local Agencies: *Describe the Tribal, state or local agencies and how the data will be used.*

☒Contractor: *Describe the contractor and how the data will be used.*

Not applicable as this system is decommissioned and is no longer used to collect or maintain PII. Data is not shared with CGI because the vendor no longer supports the IDEAS software.

☐Other Third Party Sources: *Describe the third party source and how the data will be used.*

F. Do individuals have the opportunity to decline to provide information or to consent to the specific uses of their PII?

☐Yes: *Describe the method by which individuals can decline to provide information or how individuals consent to specific uses.*

☒No: *State the reason why individuals cannot object or why individuals cannot give or withhold their consent.*

Not applicable as this system is decommissioned and is no longer used to collect or maintain PII. For more information on bureau/office or NTSB data that was migrated, please see the FBMS

Cloud and Momentum PIAs. Federal agency customers and external customer that maintained their IDEAS production application, data files, and archive are responsible for the collection and maintenance of their agency records.

G. What information is provided to an individual when asked to provide PII data? Indicate all that apply.

☐Privacy Act Statement: *Describe each applicable format.*
☐Privacy Notice: *Describe each applicable format.*
☐Other: *Describe each applicable format.*
☒None

H. How will the data be retrieved? List the identifiers that will be used to retrieve information (e.g., name, case number, etc.).

Not applicable as this system is decommissioned and is no longer used to collect or maintain PII. For more information on bureau/office or NTSB data that was migrated, please see the FBMS Cloud and Momentum PIAs. Federal agency customers and external customer that maintained their IDEAS production application, data files, and archive are responsible for the collection and maintenance of their agency records.

I. Will reports be produced on individuals?

☐Yes: *What will be the use of these reports? Who will have access to them?*
☒No

Section 3. Attributes of System Data

A. How will data collected from sources other than DOI records be verified for accuracy?

Not applicable as this system is decommissioned and is no longer used to collect or maintain PII. For more information on bureau/office or NTSB data that was migrated, please see the FBMS Cloud and Momentum PIAs. Federal agency customers and external customer that maintained their IDEAS production application, data files, and archive are responsible for the collection and maintenance of their agency records.

B. How will data be checked for completeness?

Not applicable as this system is decommissioned and is no longer used to collect or maintain PII. For more information on bureau/office or NTSB data that was migrated, please see the FBMS Cloud and Momentum PIAs. Federal agency customers and external customer that maintained their IDEAS production application, data files, and archive are responsible for the collection and maintenance of their agency records.

C. What procedures are taken to ensure the data is current? Identify the process or name the document (e.g., data models).

Not applicable as this system is decommissioned and is no longer used to collect or maintain PII. For more information on bureau/office or NTSB data that was migrated, please see the FBMS Cloud and Momentum PIAs. Federal agency customers and external customer that maintained their IDEAS production application, data files, and archive are responsible for the collection and maintenance of their agency records.

D. What are the retention periods for data in the system? Identify the associated records retention schedule for the records in this system.

IDEAS records were maintained under the Departmental Records Schedule (DRS) 1.3B – Long-term Financial and Acquisition Records (DAA-0048-2013-0001-0011), which was approved by the National Archives and Records Administration (NARA). The disposition is temporary and records are destroyed seven years after cut-off on final payment.

Federal agency customers and external customer that maintained their IDEAS production application, data files, and archive in accordance with their agency records retention policy and schedule.

E. What are the procedures for disposition of the data at the end of the retention period? Where are the procedures documented?

Not applicable as this system is decommissioned and is no longer used to collect or maintain PII. For more information on bureau/office or NTSB data that was migrated, please see the FBMS Cloud and Momentum PIAs. Federal agency customers and external customer that maintained their IDEAS production application, data files, and archive in accordance with their agency records retention policy and schedule.

The approved disposition methods include shredding or pulping for paper records, and degaussing or erasing for electronic records, in accordance with NARA Guidelines and 384 Departmental Manual 1.

F. Briefly describe privacy risks and how information handling practices at each stage of the "information lifecycle" (i.e., collection, use, retention, processing, disclosure and destruction) affect individual privacy.

There is minimal risk to individual privacy as DOI bureaus and offices no longer processes data in IDEAS and the legacy data was successfully migrated to the FBMS Cloud system. For Federal agency customers and the external customer, these data files are maintained by each agency in accordance with their agency's records and retention schedules. All IDEAS related hardware is on the DOI Virtual Environment. After decommissioning, the Solaris database

servers and Window application servers were re-purposed by OCIO for other ongoing and new applications.

The decommissioning of IDEAS does not have an impact to the enterprise security posture due to IDEAS being disconnected from the IBC network other than a change to delete IDEAS from the enterprise Assessment and Authorization boundary. PII no longer remains on IDEAS. Please see the FBMS Cloud and Momentum PIA for an analysis of the privacy risks and how the data is handled at each stage of the information lifecycle.

Section 4. PIA Risk Review

A. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?

☐ Yes: *Explanation*
☒ No

B. Does this system or electronic collection derive new data or create previously unavailable data about an individual through data aggregation?

☐ Yes: *Explain what risks are introduced by this data aggregation and how these risks will be mitigated.*

☒ No

C. Will the new data be placed in the individual's record?

☐ Yes: *Explanation*
☒ No

D. Can the system make determinations about individuals that would not be possible without the new data?

☐ Yes: *Explanation*
☒ No

E. How will the new data be verified for relevance and accuracy?
Not applicable as this system is decommissioned and is no longer used to collect or maintain PII. For more information on bureau/office or NTSB data that was migrated, please see the FBMS Cloud and Momentum PIAs. Federal agency customers and external customer that maintained their IDEAS production application, data files, and archive are responsible for the collection and maintenance of their agency records.

F. Are the data or the processes being consolidated?

☐ Yes, data is being consolidated. *Describe the controls that are in place to protect the data from unauthorized access or use.*

☐ Yes, processes are being consolidated. *Describe the controls that are in place to protect the data from unauthorized access or use.*

☒ No, data or processes are not being consolidated.

G. Who will have access to data in the system or electronic collection? Indicate all that apply.

☐ Users
☐ Contractors
☐ Developers
☐ System Administrator
☒ Other: *Describe*

Not applicable as this system is decommissioned and is no longer used to collect or maintain PII. For more information on bureau/office or NTSB data that was migrated, please see the FBMS Cloud and Momentum PIAs. Federal agency customers and external customer that maintained their IDEAS production application, data files, and archive are responsible for the collection and maintenance of their agency records.

H. How is user access to data determined? Will users have access to all data or will access be restricted?

Not applicable as this system is decommissioned and is no longer used to collect or maintain PII. For more information on bureau/office or NTSB data that was migrated, please see the FBMS Cloud and Momentum PIAs. Federal agency customers and external customer that maintained their IDEAS production application, data files, and archive are responsible for the collection and maintenance of their agency records.

I. Are contractors involved with the design and/or development of the system, or will they be involved with the maintenance of the system?

☒ Yes. *Were Privacy Act contract clauses included in their contracts and other regulatory measures addressed?*

Privacy Act contract clauses are included in all contractor agreements.

☐ No

J. Is the system using technologies in ways that the DOI has not previously employed (e.g., monitoring software, SmartCards or Caller ID)?

☐Yes. *Explanation*
☒No

K. Will this system provide the capability to identify, locate and monitor individuals?

☐Yes. *Explanation*
☒No

L. What kinds of information are collected as a function of the monitoring of individuals?

Not applicable as this system is decommissioned and is no longer used to collect or maintain PII. For more information on bureau/office or NTSB data that was migrated, please see the FBMS Cloud and Momentum PIAs. Federal agency customers and external customer that maintained their IDEAS production application, data files, and archive are responsible for the collection and maintenance of their agency records.

M. What controls will be used to prevent unauthorized monitoring?

Not applicable as this system is decommissioned and is no longer used to collect or maintain PII. For more information on bureau/office or NTSB data that was migrated, please see the FBMS Cloud and Momentum PIAs. Federal agency customers and external customer that maintained their IDEAS production application, data files, and archive are responsible for the collection and maintenance of their agency records.

N. How will the PII be secured?

(1) Physical Controls. Indicate all that apply.

 ☒Security Guards
 ☒Key Guards
 ☒Locked File Cabinets
 ☒Secured Facility
 ☒Closed Circuit Television
 ☒Cipher Locks
 ☒Identification Badges
 ☐Safes
 ☐Combination Locks
 ☒Locked Offices
 ☒Other. *Describe*

The IDEAS system and hardware are located in secured DOI facilities. This system is decommissioned and is no longer used to collect or maintain PII. For more information, see the FBMS Cloud and Momentum PIAs. Federal agency customers and external customer that maintained their IDEAS production application, data files, and archive are responsible for implementing the physical controls for their system.

(2) Technical Controls. Indicate all that apply.

☒ Password
☒ Firewall
☒ Encryption
☒ User Identification
☐ Biometrics
☒ Intrusion Detection System (IDS)
☒ Virtual Private Network (VPN)
☒ Public Key Infrastructure (PKI) Certificates
☒ Personal Identity Verification (PIV) Card
☒ Other. *Describe*

In addition to the controls above, IDEAS also uses Transport Layer Security. The IDEAS system and hardware are located in a secured DOI environment with appropriate security controls. The IDEAS database servers and Window application servers will be sanitized and re-purposed. This system is decommissioned and is no longer used to collect or maintain PII. For more information, see the FBMS Cloud and Momentum PIAs. Federal agency customers and external customer that maintained their IDEAS production application, data files, and archive are responsible for implementing the technical controls for their system.

(3) Administrative Controls. Indicate all that apply.

☒ Periodic Security Audits
☒ Backups Secured Off-site
☒ Rules of Behavior
☒ Role-Based Training
☒ Regular Monitoring of Users' Security Practices
☒ Methods to Ensure Only Authorized Personnel Have Access to PII
☒ Encryption of Backups Containing Sensitive Data
☒ Mandatory Security, Privacy and Records Management Training
☒ Other. *Describe*

The IDEAS system and hardware are located in a secured DOI environment with appropriate security controls. The IDEAS database servers and Window application servers will be sanitized and re-purposed. This system is decommissioned and is no longer used to collect or maintain PII. For more information, see the FBMS Cloud and Momentum PIAs. Federal agency customers and external customer that maintained their IDEAS production application,

data files, and archive are responsible for implementing the administrative controls for their system.

O. Who will be responsible for protecting the privacy rights of the public and employees? This includes officials responsible for addressing Privacy Act complaints and requests for redress or amendment of records.

The Director, Office of Acquisition and Property Management is the IDEAS Information System Owner and the official responsible for oversight and management of the IDEAS security and privacy controls and the protection of data during the decommission process. The IDEAS Information System Owner is also responsible for ensuring adequate safeguards are implemented to protect individual privacy in compliance with Federal laws and policies for the use and decommissioning of IDEAS, and for addressing complaints or requests in consultation with DOI privacy officials.

This system is decommissioned and is no longer used to collect or maintain PII. For more information, please see the FBMS Cloud and Momentum PIAs. Federal agency customers and external customer that maintained their IDEAS production application, data files, and archive are responsible for the collection and maintenance of their agency records.

P. Who is responsible for assuring proper use of the data and for reporting the loss, compromise, unauthorized disclosure, or unauthorized access of privacy protected information?

The IDEAS Information System Owner is responsible for oversight and management of the IDEA security and privacy controls, and for ensuring to the greatest extent that data is properly managed and that all access to the data has been granted in a secure and auditable manner. The Information System Owner is also responsible for ensuring that any loss, compromise, unauthorized access or disclosure of PII is reported to US-CERT within 1-hour of discovery in accordance with Federal policy and established procedures. The Federal agency customers and external customer are responsible for reporting of any potential loss, compromise, unauthorized access or disclosure of data resulting from their activities or management of the data.

However, the IDEAS system was decommissioned and is no longer used to collect or maintain any data. For more information, please see the FBMS Cloud and Momentum PIAs. Federal agency customers and external customer are responsible for the collection and maintenance of their agency records.